

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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Attorney for the Debtor-in-Possession

In re:

Mark Anthony Andreottis II,
Debtor-in-Possession .

Case No.: 17-15603-JKS

Chapter 13
Judge: Hon. John K. Sherwood
Hearing Date : 9/7/2017, 10:00am

**DEBTORS' CERTIFICATION OF COUNSEL
IN OPPOSITION TO
U.S. TRUSTEE'S SHORT-NOTICE MOTION TO CONVERT OR DISMISS**

Thaddeus R. Maciag, of full age, certifies and says:

1. I am attorney for the Debtor-in-Possession in the within matter, and as such am familiar with the facts of this Certification.
2. I here file this Certification on behalf of the Debtor, in opposition to the short-notice Motion to Convert or Dismiss filed by the Office of United States Trustee, as to the Debtor having had post-341 documents still outstanding, as to Proof of Insurance on the three real estate properties owned by the Debtor.
3. The pending short-notice motion lists only three grounds for the relief sought. The Debtor has now satisfied all three grounds, having submitted to the U.S. Trustee all outstanding proofs of insurance, thus meeting all three issues raised in the pending

Motion.

4. I certify that the Debtor provided the following proofs of insurance, and I emailed same to the United States Trustee, on September 5 and 6, 2017:
 - (a) Proof of Insurance re the real property at 386 Brownstone Road, Wyckoff, N.J.
 - (b) Proof of Insurance re the real property at 811 Willow Ave. #1S, Hoboken, N.J.
 - (c) Proof of Insurance re the real property at 150 6th Street #3, Hoboken, N.J.
5. The Debtor having now submitted Proof of Insurance re all three properties, all missing Proofs of Insurance have now been filed as to the short-notice Motion as presently on for 10:00am Thursday Sept. 7. Thus, of the three grounds raised in the pending motion, ALL missing proofs have now been submitted, and there no longer remain any grounds to continue to prosecute the instant motion.
6. Is accordingly respectfully submitted that the pending Motion should accordingly be withdrawn as moot per LBR 9013-3(a), or, if not withdrawn, should be Denied.

Respectfully submitted,

MACIAG LAW, LLC

/s/ Thaddeus R. Maciag

Thaddeus R. Maciag, Esq.

Attorney for the Debtor-in-Possession

Date: September 6, 2017